

The Honorable David W. Christel

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,)	CASE NO. MJ20-5253
)	
Plaintiff,)	
)	COMPLAINT for VIOLATION
v.)	18 U.S.C. § 2251(a), (e)
)	
MICHAEL MORRILL,)	
)	
Defendant.)	

BEFORE, The Honorable David W. Christel, United States Magistrate Judge, U.S.
Courthouse, Tacoma, Washington.

COUNT 1

(Production of Child Pornography)

Between at least in or about 2016 and in or about 2020, at Pierce and King
Counties, within the Western District of Washington, and elsewhere, MICHAEL
MORRILL employed, used, persuaded, induced, enticed, and coerced a minor, to engage
in sexually explicit conduct, and attempted to do so, for the purpose of producing a visual
depiction of such conduct and transmitting any live visual depiction of such conduct,
knowing and having reason to know that such visual depiction would be transported and
transmitted using any means or facility of interstate and foreign commerce, such visual

1 depiction was transported and transmitted using any means or facility of interstate and
2 foreign commerce and in and affecting interstate and foreign commerce, and such visual
3 depiction was produced using materials that had been mailed, shipped, and transported in
4 interstate and foreign commerce.

5 All in violation of Title 18, United States Code, Section 2251(a), (e).

6 And the Complainant states that this Complaint is based on the following
7 information:

8 I, Kelsey M. Mendoza, being first duly sworn on oath, depose and say:

9 **I. INTRODUCTION**

10 1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and
11 have been since January 2019. I am currently assigned to the Seattle Division's Tacoma
12 Resident Agency. As an FBI Special Agent, I investigate criminal violations relating to
13 child exploitation and child pornography, including violations pertaining to the illegal
14 production, distribution, receipt and possession of child pornography, and material
15 involving the sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252,
16 2252A, 2422, and 2426. I have received specialized training from the FBI Academy
17 consisting of legal classes, investigative techniques, evidence preservation and collection,
18 financial related crimes, and other law enforcement training classes. Through my
19 training and experience, I have developed an understanding of common habits and
20 practices used by those engaged in criminal acts against children.

21 2. I am familiar with and have participated in a variety of investigative
22 techniques including but not limited to: surveillance, interviewing of witnesses/suspects,
23 and the execution of search and seizure warrants that involved child exploitation and/or
24 child pornography offenses, and the search and seizure of computers and other digital
25 devices.

26 3. As detailed below, based on my investigation and the investigation of other
27 law enforcement officers, I believe there is probable cause to conclude that MICHAEL
28

1 MORRILL has committed the offense charged in Count 1 of this Complaint—namely,
2 production of child pornography in violation of 18 U.S.C. § 2251(a), (e).

3 4. The facts set forth in this complaint are based on my own personal
4 knowledge; knowledge obtained from other individuals during my participation in this
5 investigation, including other law enforcement officers; review of documents and records
6 related to this investigation; communications with others who have personal knowledge
7 of the events and circumstances described herein; and information gained through my
8 training and experience.

9 5. Because this complaint is offered for the limited purpose of establishing
10 probable cause, I list only those facts that I believe are necessary to support such a
11 finding. I do not purport to list every fact known to me or others as a result of this
12 investigation.

13 6. This Complaint is being presented electronically pursuant to Local
14 Criminal Rule CrR 41(d)(3).

15 II. SUMMARY OF INVESTIGATION

16 7. This investigation arose from online activities by a user of multiple
17 websites devoted to child sexual exploitation. More specifically, the SUBJECT USER—
18 who used an alias that is indicative of a sexual interest in children—shared multiple
19 images of child sexual abuse material over the internet. That user also posted multiple
20 messages claiming that he was responsible for creating these images, that he was actively
21 exploiting a child and had been for years, and generally confirming his interest in child
22 sexual exploitation. Law enforcement was able to identify the prepubescent minor
23 (MV1) depicted in these images, and MV1 has identified MICHAEL MORRILL as the
24 person who exploited her. On the evening of November 2, 2020, federal agents arrested
25 MORRILL after executing a search warrant at his home in Federal Way.

26 8. As noted, the genesis of this investigation was activity by the SUBJECT
27 USER (MORRILL) on multiple websites devoted to child sexual exploitation, which
28 because of ongoing investigations related to these websites, I will not identify.

1 9. On April 19, 2020, an FBI undercover agent entered a website devoted to
2 child sexual exploitation and started chatting with the SUBJECT USER via private
3 message. During that conversation, SUBJECT USER confirmed he used the same alias
4 on another website devoted to child sexual exploitation.

5 10. On April 22, 2020, an FBI undercover agent entered the same website and
6 again chatted with the SUBJECT USER in private exchange. During the conversation,
7 the SUBJECT USER shared an image with the undercover which SUBJECT USER said
8 was not for public posting. The undercover viewed and downloaded the file, which was
9 an image depicting a girl who appeared to be between five and seven years old wearing
10 only pink underwear and laying on her back on a white comforter on a bed. Most of her
11 face has been obscured by a black mark added to the image.

12 11. In June 2020, an FBI undercover agent entered that website and saw the
13 SUBJECT USER had posted a message available to all users on the site purporting to
14 offer pictures of a purportedly seven-year-old girl followed by links to the following
15 images:

- 16 • An image depicting a fully nude prepubescent minor who appears to be
17 between six and ten years old, kneeling or bending over at the waist.¹ The
18 girl has a purple object inserted into or covering her anus. The girl's vagina
19 is exposed for the camera. The girl's face is not visible in the image. The
20 girl has no pubic hair, is petite and has young bodily features.
- 21 • An image depicting a fully nude prepubescent girl between six and ten
22 years old, lying down on a red blanket with her legs spread apart. The
23 girl's vagina is prominently exposed for the camera. The girl is holding a
24 piece of paper with a specific message that is covering her face. The girl
25

26
27 ¹ Estimates of the approximate age of children depicted in the files described herein are based upon general life
28 experience, personal interactions with children of all ages in personal and professional settings, including with
victims of child exploitation offenses, prior viewing of images depicting the sexual exploitation of children, and my
training and experience as a law enforcement agent.

has no pubic hair and no noticeable breast development. The girl also has young-looking bodily features.²

12. Following these links, the SUBJECT USER also posted a message available to all users on the same public chat and explained that the purple object in the first image was a “buttplug” and described the circumstances of the creation of the picture with that object, as well as his sexual abuse of this little girl.

13. In other public postings by the SUBJECT USER to websites devoted to child sexual exploitation, the SUBJECT USER provided further evidence of the SUBJECT USERS’s interest in child sexual abuse and child pornography (all grammar and spelling as in original). For example:

- August 2020: SUBJECT USER posted that “child porn” increased his heart rate and allowed him to ejaculate multiple times per day;
- July 2020: SUBJECT USER posted that he loved something he described as a “12yo creampie;”
- March 2020: SUBJECT USER commented that a series of images gave him the idea of engaging in a particular sex act with a particular child;
- January 2020: SUBJECT USER posted that he loved a picture depicting a toddler in a bath;
- December 2019: SUBJECT USER posted that he had engaged in anal penetration, digital penetration, and oral copulation with a five year old girl who was then seven;

14. During this investigation, law enforcement identified postings by a user of another child exploitation website with a different username consisting of a set of images that appear to depict the same young girl as above. In multiple images shared by this user, a distinctive (based on its color and pattern) blanket is visible underneath or nearby her. For example, in one image, the girl is laying on what appears to be a bed. She is

² These images are available for review by the issuing magistrate upon request.

1 partially naked and wearing only underwear. A black mark is placed over her eyes,
2 obscuring part of her face. The blanket is seen partially underneath her. In a second
3 image from that series, a girl, between three and four years old is lying on her back on a
4 white comforter. She appears to be naked. Her legs are spread, and her vaginal area is
5 full exposed. A piece of white paper covers her torso and appears to contain a message to
6 another offender. It indicates the subject of the photo is four years old and bears a date
7 on a day in the summer of 2016. The same blanket is visible.

8 15. MV1 resides in the Western District of Washington and is a prepubescent
9 minor whose age is consistent with the age of the girl depicted in the images described
10 above. FBI identified MV1 as a person who may be the victim depicted in these images.
11 During an interview on November 2, 2020, MV1 identified herself as the subject of some
12 of the images described above and explained that MICHAEL MORRILL was responsible
13 for creating them.

14 16. Also on November 2, 2020, a witness (W1) who knows MV1 and
15 MORRILL recognized the blanket depicted in the photos described in Paragraph 14 as a
16 blanket MV1 has owned since she was an infant and that was often with her. W1 also
17 identified the white comforter depicted in several of the photos shared by the SUBJECT
18 USER as consistent with bedding owned by MORRILL. While W1 could not say when
19 or where MORRILL might have taken sexually explicit photos of MV1, W1 confirmed
20 that he had regular, unsupervised contact with MV1 between at least 2016 and 2020.

21 17. From W1 and other investigative efforts, I have identified the following
22 chronology of MORRILL's address history. Prior to 2014, MORRILL resided at a home
23 in Tacoma, Washington. Sometime thereafter and before 2016, he relocated to a home in
24 Federal Way, Washington. In April of this year, MORRILL returned this Tacoma
25 residence but moved back to Federal Way within the last few weeks.

26 18. On November 2, 2020, I obtained a search warrant for MORRILL's Federal
27 Way home, which a team of law enforcement officers executed later that evening.
28 During a post-*Miranda* interview, MORILL said, among other things, that he had seen

1 child pornography on the internet. Once the interview turned to this specifics of this
 2 investigation, MORRILL ask for an attorney. And the interview was terminated.
 3 MORRILL was then taken into custody.

4 19. During the search, agents seized several digital devices and other items of
 5 physical evidence. Review of those devices is ongoing. But among the items of physical
 6 evidence seized were 1) a white comforter that is consistent with the comforter depicted
 7 in several of the images described above; 2) several purple buttplugs, each of which is
 8 consistent with the the buttplug described above by the SUBJECT USER; and 3)
 9 underwear/clothing that is consistent with items MV1 is wearing in several of the images
 10 described above.

11 III. CONCLUSION

12 20. Based on the above facts, I believe that there is probable cause to conclude
 13 that MICHAEL MORRILL committed the offense charged in this Complaint.

14
 15 
 16 KELSEY M. MENDOZA, Complainant
 17 Special Agent, FBI
 18

19 The above-named agent provided a sworn statement attesting to the truth of the
 20 foregoing Complaint and Affidavit submitted to me by reliable electronic means pursuant
 21 to Fed. R. Crim. Proc. 4.1(a), and the Court hereby finds that there is probable cause to
 22 believe the Defendant committed the offense set forth in the Complaint.

23 DATED this 3rd day of November, 2020.

24
 25 
 26 DAVID W. CHRISTEL
 27 United States Magistrate Judge
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